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ELECTRONICALLY FILED

April 25, 2008

Via Facsimile (212) 805-7912

Hon. John G. Koeltl Daniel Patrick Moynihan United States Courthouse 500 Pearl St., Room 1030 New York, NY 10007 APPLICATION GRANTED SO ORDERED

John G. Koeltl, U.S.D.J.

JUDY SUDHING, KOFLTL

Re:

PT Jaya Samundra Karunia Shipping v. USL Shipping FZE Dubai, USL

Shippin FZE Dubai, USL FZE or United Shippers Limited

Docket Number: 08 Civ. 1891 (JGK)

Our Reference Number: 1373

Dear Judge Koeltl:

We are attorneys for the Plaintiff in this admiralty action brought pursuant to Supplemental Admiralty Rule B of the Federal Rules of Civil Procedure. We write to request that the Court adjust the briefing schedule for the pending Motion for Countersecurity filed in this action by Defendant on April 16, 2008.

On or about February 29, 2008 an Ex-Parte Order authorizing process of maritime attachment was issued permitting restraint of Defendant's property in the hands of garnishee banks located within the Southern District of New York.

In response to service of the Ex-Parte Order and Writ, various garnishee banks restrained Defendant's property in the amount of \$447,040.19. Defendant, through its attorneys at Blank Rome, filed a Motion for Countersecurity on April 16, 2008. However, the electronic notification aspect of the ECF system was not working properly, and we never received notification that the motion had been filed. We only became aware that a motion had been filed when we received courtesy copies of the motion papers in our office yesterday.

We are currently contacting the ECF help desk to rectify this problem. We have also contacted opposing counsel regarding the problem with ECF notification. Defendant's counsel consented to adjust the briefing schedule to take account of the delay in notification. Particularly, Defendant's counsel consented that Plaintiff have until May 8, 2008 (10 business days from the receipt of the motion papers), to file its opposition.

Therefore, we respectfully request that the Court memo-endorse this letter providing that Plaintiff's opposition papers are not due until May 8, 2008.

Should your Honor have any questions or comments we are available to discuss the same at any convenient time to the Court. We thank your Honor for consideration of this request.

Respectfully submitted,

Nancy R. Peterson

<u>Via Facsimile (212)885-5001</u>

Jeremy O. Harwood Jack Greenbaum Blank Rome LLP

Cc: